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[Counsel for Plaintiff on Signature Page]

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

**CALIFORNIA HIGH-SPEED RAIL
AUTHORITY,**

Plaintiff,

v.

**UNITED STATES DEPARTMENT OF
TRANSPORTATION, et. al.,**

Defendants.

) Case No. 25-cv-02004

)
) **JOINT STIPULATION TO CONTINUE THE**
) **NOVEMBER 24, 2025 INITIAL SCHEDULING**
) **CONFERENCE AND TO EXTEND THE**
) **NOVEMBER 10, 2025 JOINT STATUS REPORT**
) **DEADLINE**

1 The parties, by and through their undersigned counsel, respectfully request that the Court
2 continue the November 24, 2025 Initial Scheduling Conference and extend the November 10, 2025 Joint
3 Status Report deadline, and state as follows:

4 1. Plaintiff filed this action on July 17, 2025. ECF No. 1.

5 2. On July 21, 2025, the Court set an Initial Scheduling Conference for November 24, 2025,
6 and directed the Parties to submit a Joint Status Report, including a Rule 26(f) discovery plan, by
7 November 10, 2025. ECF No. 6 ¶ 6.

8 3. On September 22, 2025, Defendants moved to dismiss Plaintiff's Complaint, and on
9 October 10, 2025, Plaintiff moved for a preliminary injunction. ECF Nos. 12, 15.

10 4. A hearing on both motions is set for November 17, 2025. ECF No. 38.

11 5. The Parties have conferred and agree that good cause exists to continue the Initial
12 Scheduling Conference and extend the Joint Status Report deadline. The Court's rulings on the pending
13 motions (ECF Nos. 12, 15) are likely to significantly affect the scope and timing of further proceedings,
14 and deferring these deadlines will conserve the resources of both the Parties and the Court.

15 6. Accordingly, the Parties respectfully request that the Initial Scheduling Conference be
16 continued and Joint Status Report deadline be extended, to dates to be agreed upon by the Parties, after
17 the Court resolves the pending motions. ECF Nos. 12, 15.

18 7. The Parties will submit a proposed scheduling order, including proposed dates for the
19 Initial Scheduling Conference and Joint Status Report, within fourteen (14) days of the Court's rulings on
20 the pending motions. A proposed order is attached.

21
22 DATED: November 14, 2025

Respectfully submitted,

23 BRETT A. SHUMATE
24 Assistant Attorney General
Civil Division

25 ERIC J. HAMILTON
26 Deputy Assistant Attorney General

27 JOSEPH E. BORSON
28 Assistant Branch Director

/s/ Kathryn Barragan

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DATED: November 14, 2025

Respectfully submitted,

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/s/ Sharon O'Grady

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